## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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)	Case No: 1:10-CV-4257
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)	Hon. Robert M. Dow, Jr.
)	U.S. District Court Judge
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)	Hon. Sheila M. Finnegan
)	U.S. Magistrate Judge
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## MOTION FOR LEAVE TO FILE RESPONSE TO CITATION TO ADDITIONAL AUTHORITY, INSTANTER

NOW COME the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese), R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr., and Tony Kole, and move this Honorable Court to grant Plaintiffs leave to file their Response to Defendant's Citation to Additional Authority, *instanter*. In support thereof, Plaintiffs state as follows:

1. Plaintiffs were due to file a Response to Defendants' Citation to Additional Authority by May 29, 2015. Due to Plaintiffs' counsel's caseload, including filings in the appeal/cross-appeal of *Ezell v. City of Chicago*, 14-3312/14-3322 (which was also due May 29, 2015), *Culp v. Madigan*, 3:14-CV-3320 (N.D.Ill.), and *Veasey v. Wilkins*, 5:14-CV-369 (E.D.NC), Plaintiffs' counsel was regrettably unable to file the Response by May 29, 2015.

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2. The proposed Response is attached, and great prejudice will result to Plaintiffs if

they are unable to respond to Defendants' arguments.

WHEREFORE, the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese),

R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr.,

and Tony Kole, request this Honorable Court to grant Plaintiffs leave to file their Response to

Defendants' Citation to Additional Authority, instanter, as well as any and all further relief as

this Court deems just and proper.

Dated: June 10, 2015 Respectfully submitted,

By: /s/David G. Sigale
David G. Sigale

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## CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

- 1. On June 10, 2015, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
- 2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale	
Attorney for Plaintiffs	

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